

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:	)	Case No:	17-18232
April Woodard	)		
Debtor	)	Chapter:	Chapter 13
	)		
	)	Judge:	Deborah L. Thorne

**NOTICE OF MOTION**

**To:** April Woodard, 6428 S. Langley #2, Chicago, IL, 60637

Marilyn O. Marshall, 224 S. Michigan Ave. #800, Chicago, IL, 60604

Office of the US Trustee, 219 S. Dearborn, Suite 873, Chicago, IL 60604

ISAC, Attn: Bankruptcy Department, 1755 Lake Cook Road, Deerfield, IL 60015

Edfinancial on behalf of US Dept. of Education, 120 N. Seven Oaks Dr., Knoxville, TN 37922

SEE ATTACHED SERVICE LIST OF ALL CREDITORS

**PLEASE TAKE NOTICE** that on **March 18, 2020 at 9:30am** I shall appear before the Honorable Judge **Deborah L. Thorne** at 219 South Dearborn St, Courtroom 613, Chicago IL 60604 and then and there present the attached **MOTION TO MODIFY CONFIRMED PLAN**, a copy of which is attached hereto.

By: /s/ Dale Riley  
Dale Riley

**CERTIFICATE OF SERVICE**

I, Dale Riley, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, for 55 E. Monroe, Suite 3400, Chicago, Illinois, on 2/25/2020.

By: /s/Dale Riley  
Dale Riley

**Attorneys for the Debtor**

Geraci Law L.L.C.  
55 E. Monroe Street #3400  
Chicago, Illinois 60603  
(Ph): 312.332.1800 (Fax): 877.247.1960

AFNI  
Bankruptcy Department  
PO Box 3097  
Bloomington IL 61702

Enhanced Recovery Corp.  
Bankruptcy Department  
8014 Bayberry Road  
Jacksonville FL 32256

Pangea Apartments  
  
7809 S. Essex Ave  
Chicago IL 60649

ATG Credit  
Attn: Bankruptcy Dept.  
1700 W Cortland St Ste 2  
Chicago IL 60622

Sprint  
Bankruptcy Dept.  
PO Box 7949  
Overland Park KS 66207

Quantum3 Group  
Bankruptcy Department  
PO Box 788  
Kirkland WA 98083

Aurora Holdings  
  
6428 S. Langley  
Chicago IL 60637

AT&T  
Bankruptcy Dept.  
PO Box 8212  
Aurora IL 60572-8212

Secretary of State  
Attn: Safety & Financial Resp  
2701 S. Dirksen Pkwy.  
Springfield IL 62723

Capital One Auto Finance  
Bankruptcy Department  
7933 Preston Rd.  
Plano TX 75024

Equifax  
Attn: Bankruptcy Dept.  
PO Box 740241  
Atlanta GA 30374

South Shore Hospital  
Attn: Bankruptcy Department  
8012 S. Crandon  
Chicago IL 60617

Citibank Student Loan Corp.  
Bankruptcy Department  
PO Box 6191  
Sioux Falls SD 57117-6191

Experian  
Attn: Bankruptcy Dept.  
PO Box 2002  
Allen TX 75013

Premier Credit Corp.  
Bankruptcy Dept.  
4245 Brockton Dr. SE, Ste. B  
Kentwood MI 49512

City of Chicago Bureau Parking  
Bankruptcy Dept/City Clerk  
121 N. LaSalle St  
Room 107  
Chicago IL 60602

First Premier BANK  
Attn: Bankruptcy Dept.  
601 S Minnesota Ave  
Sioux Falls SD 57104

Transunion  
Attn: Bankruptcy Dept.  
PO Box 1000  
Chester PA 19022

Comcast  
Attn: Bankruptcy Dept.  
5330 E. 65th St.  
Indianapolis IN 46220

Greentree  
Attn: Bankruptcy Department  
PO Box 3417  
Escondido CA 92033

Trustmark Recovery Services  
Bankruptcy Department  
541 Otis Bowen Dr.  
Munster IN 46321

DirecTV  
Bankruptcy Department  
PO Box 78626  
Phoenix AZ 85062

ISAC  
Attn: Bankruptcy Department  
1755 Lake Cook Road  
Deerfield IL 60015

University of Chicago Med Ctr  
Bankruptcy Dept.  
15965 Paysphere Circle  
Chicago IL 60674

DTE Energy  
Attn: Bankruptcy Department  
PO Box 2859  
Detroit MI 48260

Keynote Consulting  
Bankruptcy Department  
220 W Campus Drive # 102  
Arlington Heights IL 60004

University of Chicago Phys Grp  
Bankruptcy Department  
75 Remittance Dr., Ste. 1385  
Chicago IL 60675

Edfinancial Services L  
Attn: Bankruptcy Dept.  
120 N Seven Oaks Dr  
Knoxville TN 37922

Komyatte & Casbon, PC  
Bankruptcy Dept.  
9650 Gordon Drive  
Highland IN 46322

US Cellular  
C/O Credit Management LP  
4200 International Pkwy  
Carrollton TX 75007

Mercy Hospital & Medical Ctr.  
Bankruptcy Department  
PO Box 97171  
Chicago IL 60616

Why Not Lease It  
Bankruptcy Dept  
1750 Elm St  
Suite 1200  
Manchester NH 03104

NCO Financial Systems, Inc  
Bankruptcy Department  
507 Prudential Rd.  
Horsham PA 19044

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

<b>In Re:</b>  <b>April Woodard</b> <b>Debtor</b>	) ) ) ) )	<b>Case No: 17-18232</b>  <b>Chapter: Chapter 13</b>  <b>Judge: Deborah L. Thorne</b>
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**MOTION TO MODIFY CONFIRMED PLAN**

NOW COMES the Debtor, Ms. April Woodard (the “Debtor”), by and through her attorneys, Geraci Law L.L.C., to present her **MOTION TO MODIFY CONFIRMED PLAN**, and states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a “core proceeding” under 28 U.S.C. 157(b)(2).
2. The Debtor filed her Petition for Relief and plan under Chapter 13 of the U.S. Bankruptcy Act on 06/15/2017.
3. The Debtor’s plan was confirmed by the Court on 10/18/2017 with monthly plan payments of \$200 and a 3% dividend to unsecured claims.
4. The Debtor’s income has increased such that she is able to afford monthly plan payments of \$270.
5. The plan is currently making disbursements on student loans that are in deferral and that the Debtor prefers to deal with directly outside of the plan as long-term debts.
6. For the reasons stated above, it is necessary for the successful completion of the Debtor’s plan to increase the monthly plan payment to \$270 and to stop disbursements for student loans. The plan will be feasible to pay unsecured claims an increased dividend of 33%.

enter an order:

1. Increasing the monthly plan payment to \$270.
2. Increasing the dividend to unsecured claims to 33%.
3. Stopping further disbursements for student loans.
4. Any other relief the court deems proper.

**By:** /s/ Dale Riley  
Dale Riley

**Attorneys for the Debtor**

Geraci Law L.L.C.  
55 E. Monroe Street #3400  
Chicago, Illinois 60603  
(Ph): 312.332.1800 (Fax): 877.247.1960